

## Indiana Department of Environmental Management

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Frank O'Bannon Governor

Lori F. Kaplan Commissioner

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August 15, 2003

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: **GUIDE CORPORATION / 095-17226-00005** 

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

## Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, within eighteen (18) days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.



Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency 401 M Street Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



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100 North Senate AvenueP. O. Box 6015Indianapolis, Indiana 46206-

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Mr. Keith Updike Guide Corporation 2915 Pendleton Avenue Anderson, Indiana 46016

August 15, 2003

Re: 095-17226-00005

First Minor Permit Modification to: Part 70 permit No. T095-6894-00005

Dear Mr. Updike:

Guide Corporation was issued a Part 70 permit on July 12, 2002 for a plastic molding and assembly facility. A letter requesting changes to this permit was received on May 7, 2003. Pursuant to 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding a new fluidized bed furnace (S-117-FB) to clean nozzles, racks, and manifolds.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

#### Attachments

#### ERG/YC

cc: File - Madison County

Madison County Health Department
Anderson Office of Air Management
Air Compliance Section Inspector - D. J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development -Sara Cloe
Technical Support and Modeling - Michele Boner

## Indiana Department of Environmental Management



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100 North Senate Avenue

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## **PART 70 OPERATING PERMIT** OFFICE OF AIR QUALITY and ANDERSON OFFICE OF AIR MANAGEMENT

## **Guide Corporation** 2915 Pendleton Avenue Anderson, Indiana 46016 with Chrome Operations at 1316 Alexandria Pike, Anderson, Indiana 46012

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-6894-00005 Issued by: Issuance Date: July 12, 2002 Janet G. McCabe, Assistant Commissioner Office of Air Quality Expiration Date: July 12, 2007

First Reopening No.: 095-16251-00005, issued November 21, 2002

First Minor Permit Modification: No.: Pages Affected: 5, 6, 38 and 39

095-17226-00005

## Indiana Department of Environmental Management

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Lori F. Kaplan Commissioner

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| Issued by: Original signed by                          | Issuance Date: August 15, 2003 |
|--|--------------------------------|
| Paul Dubenetzky, Branch Chief<br>Office of Air Quality |                                |

Guide Corporation Anderson, Indiana

Permit Reviewer: Holly M. Stockrahm

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Permit Reviewer: Holly M. Stockrahm

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Anderson Office of Air Management. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a plastic molding and assembly operation, surface coating, which produce automotive lighting and trim parts and electronic components used in the automotive industry.

Responsible Official: Plant Manager

Source Address: 2915 Pendleton Ave., Anderson, IN 46016 with Chrome

Operations at 1316 Alexandria Pike, Anderson, IN 46012

Mailing Address: 2915 Pendleton Ave., Anderson, IN 46016

General Source Phone Number: (765) 221-6977 SIC Code: 3714, 3647 County Location: Madison

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source under PSD

Major Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

## A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, identified as E-36-1P, applies coatings to plastic lamp reflectors using a high volume, low pressure paint spray equipment, maximum throughput is 90 units per hour, using 3-stage dry filter as control, and exhausting to stack E-36-1P. (Constructed in 1995)
- (b) One (1) paint booth, identified as E-35-1P, applies coatings to plastic lamp reflectors using a high volume, low pressure paint spray equipment, maximum throughput is 90 units per hour, using 3-stage dry filter as control, and exhausting to stack E-35-1P. (Constructed in 1995)
- (c) One (1) paint booth, identified as Q-112-2P, applies coatings to plastic lenses using a high volume, low pressure paint spray equipment, maximum throughput is 660 units per hour, using dry filter as control, and exhausting to stack Q-112-2P. (Constructed in 1995)
- (d) One (1) boiler, identified as 6, fueled by natural gas, maximum heat input capacity of 187.5 MMBtu per hour, using low NOx burners as control, and exhausting to stack 2. (Constructed in 1965)
- (e) One (1) boiler, identified as 7, fueled by natural gas, maximum heat input capacity of 250 MMBtu per hour, using low NOx burners as control, and exhausting to stack 3. (Constructed in 1975)

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(f) One (1) decorative chrome electroforming operation, identified as Electroforming Center/Tank 35 A, maximum rate is 0.6 pounds of chromic acid per hour using fume suppressant wetting agent as control. Operation of the scrubber is not required for compliance. (Constructed in 1982)

## A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (326 IAC 8-3-2)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (c) Other activities or categories not previously identified: Equipment Maintenance Paint (326 IAC 6-3-2)
- (d) Other activities or categories not previously identified: paint booths identified as Insignificant Activity (z) in the Technical Support Document (326 IAC 6-3-2)
- (e) Other emission units, not regulated by a NESHAP, with PM10 and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) natural gas-fired fluidized bed furnace, identified as S-117-FB, used to burn off build-up materials on nozzles, racks, and manifolds, with a maximum heat input rate of 0.36 MMBtu/hr and a maximum throughput rate of 315 pounds per hour, using a cyclone and a 0.40 MMBtu/hr natural gas-fired afterburner (identified as S-117-AB) as control, and exhausting through stack S-117-1B. This furnace is also equipped with a 0.45 MMBtu/hr natural gas-fired preheater. (326 IAC 4-2).

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

Permit Reviewer: Holly M. Stockrahm

#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

## B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

#### B.3 Enforceability [326 IAC 2-7-7]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, and Anderson Office of Air Management, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Anderson Office of Air Management,.

## B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

#### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

# B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011 Guide Corporation First Minor Permit Modification No.: 095-17226-00005 Page 9 of 53 Anderson, Indiana Modified by: ERG/YC OP No. T095-6894-00005

Permit Reviewer: Holly M. Stockrahm

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and Anderson Office of Air Management, within a reasonable time, any information that IDEM, OAQ, and Anderson Office of Air Management, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and Anderson Office of Air Management, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

#### B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

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Permit Reviewer: Holly M. Stockrahm

including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and Anderson Office of Air Management, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
  - (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

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(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Anderson Office of Air Quality, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Anderson Office of Air Management. IDEM, OAQ, and Anderson Office of Air Management, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the Anderson Office of Air Management within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Anderson Office of Air Management, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Anderson Office of Air Management: (765) 648-6158 Anderson Office of Air Management FAX: (765) 648-5924

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

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(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and Anderson Office of Air Management, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and Anderson Office of Air Management, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

#### B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or the Anderson Office of Air Management, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

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- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or Anderson Office of Air Management, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or Anderson Office of Air Management, has issued the modification. [326 IAC 2-7-12(b)(7)]

## B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011 Guide Corporation First Minor Permit Modification No.: 095-17226-00005 Page 15 of 53 Anderson, Indiana Modified by: ERG/YC OP No. T095-6894-00005

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using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

## B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or the Anderson Office of Air Management, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or the Anderson Office of Air Management, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or the Anderson Office of Air Management, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or the Anderson Office of Air Management, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and Anderson Office of Air Management, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-

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1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management, on or before the date it is due.
  - (2) If IDEM, OAQ, and Anderson Office of Air Management, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and Anderson Office of Air Management, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and Anderson Office of Air Management, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, and Anderson Office of Air Management, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

#### B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and Anderson Office of Air Management, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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#### B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

#### B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and Anderson Office of Air Management, U.S. EPA, or an authorized representative to perform the following:

- Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management, P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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#### B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, and Anderson Office of Air Management, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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#### SECTION C

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

## C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

## <u>C.4</u> <u>Incineration</u> [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

## C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are
  applicable for any removal or disturbance of RACM greater than three (3) linear feet on
  pipes or three (3) square feet on any other facility components or a total of at least 0.75
  cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector

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The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

#### C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and Anderson Office of Air Management, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Anderson Office of Air Management, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

## C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

#### C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 8, 1997.
- (b) If the ERP is disapproved by IDEM, OAQ, and the Anderson Office of Air Management, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, and the Anderson Office of Air Management, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.

  [326 IAC 1-5-3]

#### C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- C.15 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
  - (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and the Anderson Office of Air Management, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
    - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
    - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
  - (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
    - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
    - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
    - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
    - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
  - (c) The Permittee is not required to take any further response steps for any of the following reasons:

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(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

# C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must

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comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Anderson Office of Air Management, on or before the date it is due.

#### C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner, or the Anderson Office of Air Management, makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner, or the Anderson Office of Air Management, within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management P.O. Box 2100 120 East 8<sup>th</sup> Street Anderson, Indiana 46011

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Anderson Office of Air Management, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

## C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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#### SECTION D.1

#### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) paint booth, identified as E-36-1P, applies coatings to plastic lamp reflectors using a high volume, low pressure paint spray equipment, maximum throughput is 90 units per hour, using 3-stage dry filter as control, and exhausting to stack E-36-1P.
- (b) One (1) paint booth, identified as E-35-1P, applies coatings to plastic lamp reflectors using a high volume, low pressure paint spray equipment, maximum throughput is 90 units per hour, using 3-stage dry filter as control, and exhausting to stack E-35-1P.
- (c) One (1) paint booth, identified as Q-112-2P, applies coatings to plastic lenses using a high volume, low pressure paint spray equipment, maximum throughput is 660 units per hour, using dry filter as control, and exhausting to stack Q-112-2P.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Pursuant to CP 095-3092, issued on January 13, 1994, the coating booth E-36-1P shall use less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per 12 consecutive month period. Compliance with this limit makes Best Available Control Technology (BACT), 326 IAC 8-1-6, not applicable.
- (b) Pursuant to CP 095-3344, issued on June 30, 1994, the paint booth E-35-1P shall use less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (BACT), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.
- (c) Pursuant to CP 095-4097, issued on January 13, 1995, coating booth Q-112-2P for the paint spray coating of automobile lamp lenses shall use Best Available control Technology (BACT). The BACT analysis for the application of paint spray coating of plastic automobile lamp lenses at this facility concluded that an HVLP application system without any add-on control equipment is the BACT. Therefore HVLP must be employed during all automobile lamp lenses spray coating operations.
- (d) Pursuant to 095-4097, issued on January 13, 1995, coating booth Q-112-2P shall be use less than forty (40) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than forty (40) tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

## D.1.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

The particulate matter (PM) over spray from these paint booths, identified as E-36-1P, E-35-IP, and Q-112-2P, shall not exceed the pound per hour emission rate established as E in the following

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formula. Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

E=4.10  $P^{0.67}$  where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### D.1.4 VOC Emissions

Compliance with Condition D.1.1 (a), (b), and (d) shall be demonstrated at the end of each quarter based on the total volatile organic compound usage for the most recent twelve (12) month period.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.5 Monitoring

- (a) The paint booths, identified as E-36-1P, E-35-1P, and Q-112-2P, have the following applicable compliance monitoring conditions based on Agreed Order, Cause No. 98-A-J-2079:
  - (1) Permittee shall keep on-site a written schedule of its paint booth cleaning that is based on the productive use (particle loading) of each individual booth.
  - (2) Dry filters will be replaced and properly positioned at the conclusion of paint booth cleaning activity. Permittee shall document the placement and integrity of the dry filters by initialing and dating a checklist.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.6 Particulate Matter (PM)

Dry filters for PM control shall be in place during operation of the respective paint booths in order to comply with D.1.5, the dry filters for PM control shall be in operation and control emissions from the spray coating booths at all times when the booths, identified as E-36-1P, E-35-1P, and Q-112-2P, are in operation.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly for booths E-36-IP and E-35-IP, and daily for booth Q-112-2P and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;

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- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each day or month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall keep on-site a written schedule of its paint booth cleaning and document the placement and integrity of the dry filters by initialing and dating a checklist.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

## D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (a), (b), and (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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#### **SECTION D.2**

#### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-7-5(15)]

- (d) One (1) boiler, identified as 6, fueled by natural gas, maximum heat capacity 187.5 MMBtu per hour, using low NOx burners as control, and exhausting to stack 2.
- (e) One (1) boiler, identified as 7, fueled by natural gas, maximum heat capacity is 250 MMBtu per hour, using low NOx burners as control, and exhausting to stack 3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM)[326 IAC 6-2-3]

(a) Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 187.5 MMBtu per hour heat input from boiler 6 shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation: Pt = Pt = (C) (a) (h) / (76.5) ( $Q^{0.75}$ ) ( $N^{0.25}$ )

- C = Maximum ground level concentration being 50 migrograms/cubic meter
- Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input
- N = Number of stacks in fuel burning operation
- a = Plume rise factor being 0.67
- (b) Pursuant to CP 095-2097-00005, issued on March 23, 1991, Boiler No. 6 shall not be fired with coal.
- (c) Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 250.0 MMBtu per hour heat input boiler 7 shall be limited to 0.46 pounds per MMBtu heat input.

This limitation is based on the following equation: Pt = (C) (a) (h) / (76.5) ( $Q^{0.75}$ ) ( $N^{0.25}$ )

- C = Maximum ground level concentration being 50 migrograms/cubic meter
- Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input
- N = Number of stacks in fuel burning operation
- a = Plume rise factor being 0.67

## D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.3 Natural Gas Certification

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The natural gas boiler certification form will document compliance with Condition D.2.1 when the boiler is burning natural gas. The certification form shall be submitted semi-annually to the address listed in Section C - General Reporting Requirements of this permit.

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#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

(f) One (1) decorative chrome electroforming operation, identified as Electroforming Center/Tank 35 A, maximum rate is 0.6 pounds of chromic acid per hour using fume suppressant wetting agent as control. Operation of the scrubber is not required for compliance. (Constructed in 1982)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions

From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to Electroforming Center/Tank 35A. A copy of this rule is attached.

#### D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)][326 IAC 14]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from Electroforming Center/Tank 35A by:
  - (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4x10<sup>-6</sup> gr/dscf)]; or
  - (2) If a chemical fume suppressant containing a wetting agent is used, by not allowing the surface tension of the electroplating bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1x10<sup>-3</sup> lb<sub>t</sub>/ft)] at any time during operation of Electroforming Center/Tank 35A when a chemical fume suppressant containing a wetting agent is used.

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

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#### D.3.5 Operation and Maintenance Plan

An Operation and Maintenance Plan (OMP) shall specify the operation and maintenance criteria for these tanks, the fume suppressant with wetting agent, and monitoring equipment and shall include the following elements:

- (a) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
- (b) A standardized checklist to document the operation and maintenance criteria for Electroforming Center/Tank 35A, the air pollution control device, and the monitoring equipment.
- (c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
- (d) A systematic procedure for identifying malfunctions and periods of excess emissions of the Electroforming Center/Tank 35A, the air pollution control device, and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (e) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.3.4, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.5(a).
- (f) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (g) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.
- (h) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of Electroforming Center/Tank 35A or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.
- (i) Compliance with this OMP shall serve to fulfill the requirements of the Preventive Maintenance Plan under 326 IAC 2-7-5(13).

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#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5] [40 CFR 63.343(c)]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the electroplating bath to comply with the limit specified in Condition D.3.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of Electroforming Center/Tank 35A at a surface tension greater than 45 dynes per centimeter shall constitute noncompliance with the standards.
  - (b) The Permittee shall monitor the surface tension of the electroplating bath during tank operation according to the following schedule:
    - (1) The surface tension shall be measured once every week on an ongoing basis provided there is no more than 40 hours of operation between each measurement with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
    - The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
    - Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (c) Once a bath solution is drained from Electroforming Center/Tank 35A and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.
- (d) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

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#### D.3.7 Record Keeping Requirements[326 IAC 2-7-5(3)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.3.3, D.3.5, and D.3.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the fume suppression by wetting agent system and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.4 and D.3.5 have taken place. The record can take the form of a checklist and should identify the following:
  - (1) The device inspected;
  - (2) The date of inspection;
  - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
  - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on Electroforming Center/Tank 35A, the wetting agent, and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of Electroforming Center/Tank 35A, the fume suppression, and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of Electroforming Center/Tank 35A, the fume suppression, and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (j) The total process operating time, as defined in Condition D.3.6 (d), of each tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressants added.

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(I) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.8.

### D.3.8 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements.

- (a) Initial Notifications
  - The Permittee shall notify IDEM, OAQ in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1). The Permittee submitted the notification in 1997.
  - (b) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.
    - (1) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
    - (2) The NCS for Electroforming Center/Tank 35A was submitted to IDEM, OAQ.
- (c) Notification of Construction or Reconstruction
  Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to
  40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without
  submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In
  addition, the Permittee may not change, modify, or reconstruct Electroforming Center/Tank
  35A without submitting a Notification of Construction or Reconstruction (NCR) to IDEM,
  OAQ.
  - (1) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).
  - (2) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
  - (3) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct Electroforming Center/Tank 35A serves as this notification.
  - (4) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ, before construction, modification, or reconstruction may commence.
- (d) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of Tank 22 and Electroforming Center/Tank 35A using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3). Because Electroforming Center/Tank 35A is located at a site that is

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a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule.

- (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).
- (2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.
  - Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.
- (3) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.

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#### SECTION D. 4 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (c) Other activities or categories not previously identified: Equipment maintenance painting (326 IAC 6-3-2)
- (d) Other activities or categories not previously identified: (326 IAC 6-3-2) paint booths identified as Insignificant Activity (z) in the Technical Support Document

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Matter Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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#### SECTION D.5

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(e) Other emission units, not regulated by a NESHAP, with PM10 and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) natural gas-fired fluidized bed furnace, identified as S-117-FB, used to burn off build-up materials on nozzles, racks, and manifolds, with a maximum heat input rate of 0.36 MMBtu/hr and a maximum throughput rate of 315 pounds per hour, using a cyclone and a 0.40 MMBtu/hr natural gas-fired afterburner (identified as S-117-AB) as control, and exhausting through stack S-117-1B. This furnace is also equipped with a 0.45 MMBtu/hr natural gas-fired preheater. (326 IAC 4-2)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the fluidized bed furnace shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY, COMPLIANCE BRANCH

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

# ANDERSON OFFICE OF AIR MANAGEMENT PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Guide Corporation

Source Address: 2915 Pendleton Ave. Anderson, IN 46016

Mailing Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016

Part 70 Permit No.: T 095-6894-00005

#### This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- **9** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- **9** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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If any of the following are not applicable, mark N/A

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| Date/Time Emergency started:  |
|---|
| Date/Time Emergency was corrected:  |
| Vas the facility being properly operated at the time of the emergency? Y N Describe:  |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| f applicable, describe the reasons why continued operation of the facilities are necessary to prevent mminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |
| Form Completed by:  |
| Title / Position:   |
| Date:   |
| Phone:  |

A certification is not required for this report.

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Permit Reviewer: Holly M. Stockrahm

Date:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION and ANDERSON OFFICE OF AIR MANAGEMENT

## PART 70 OPERATING PERMIT SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

| Source Name:<br>Source Address:<br>Mailing Address:<br>Part 70 Permit No.:  | Guide Corporation<br>2915 Pendleton, Ave. Anderson, IN 46016<br>Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016<br>T 095-6894-00005 |  |  |  |  |
|---|---|--|--|--|--|
| 9 Natural Gas Or<br>9 Alternate Fuel  <br>From:_  | burned  |  |  |  |  |
|   |   |  |  |  |  |
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |   |  |  |  |  |
| Signature:  |   |  |  |  |  |
| Printed Name:   |   |  |  |  |  |
| Title/Position:   |   |  |  |  |  |
| Phone:  |   |  |  |  |  |

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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Permit Reviewer: Holly M. Stockrahm

**Guide Corporation** 

Anderson, Indiana

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## and Anderson Office of Air Management

|   | Part   | 70 Monthly    | y Report            |                                    |
|---|--|---------------|---------------------|------------------------------------|
| Source Name:<br>Source Address:<br>Mailing Address:<br>Part 70 Permit No.:<br>Facility:<br>Parameter:<br>Limit: | ource Address: 2915 Pendleton, Ave. Anderson, IN 46016 ailing Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016 art 70 Permit No.: T 095-6894-00005 acility: Q-112-2P arameter: VOC usage |               |                     |                                    |
|   | Mont   | h:            | Year:               |                                    |
| Month   | Gallons applied  | % VOC         | Tons VOC this month | Tons of VOC for the last 12 months |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
|   |  |               |                     |                                    |
| 9<br>Devi   | No deviation occurred Deviation/s occurred ation has been repormitted by:  | in this month |                     |                                    |

| 9 Deviation/s    | occurred in this month |
|------------------|------------------------|
| Deviation has be | en reported on:        |
| Submitted by:    |                        |
| Title/Position   |                        |
| Signature        |                        |
| Date:            |                        |
| Phone :          |                        |

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Permit Reviewer: Holly M. Stockrahm

Guide Corporation

Anderson, Indiana

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

#### and

# Anderson Office of Air Management Part 70 Quarterly Report

Source Name: Guide Corporation

Source Address: 915 Pendleton, Ave. Anderson, IN 46016

Mailing Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016

Part 70 Permit No.: T 095-6894-00005

Facility: E-35-1P Parameter: VOC usage

Limit: less than 25 tons per 12 consecutive month period

| Month | Gallons applied | % VOC | Tons VOC this month | Tons of VOC for the last 12 months |
|-------|-----------------|-------|---------------------|------------------------------------|
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
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|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |

| 9     | No deviation occurred in this month |  |  |  |  |
|-------|-------------------------------------|--|--|--|--|
| 9     | Deviation/s occurred in this month  |  |  |  |  |
| Dev   | ation has been reported on:         |  |  |  |  |
| Sub   | nitted by:                          |  |  |  |  |
| Title | Position                            |  |  |  |  |
| Sigi  | ature                               |  |  |  |  |
| Dat   |                                     |  |  |  |  |
| Pho   | ne :                                |  |  |  |  |

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

#### and

# Anderson Office of Air Management Part 70 Quarterly Report

Source Name: Guide Corporation

Source Address: 2915 Pendleton, Ave. Anderson, IN 46016

Mailing Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016

Part 70 Permit No.: T 095-6894-00005

Facility: E-36-1P Parameter: VOC usage

Limit: less than 25 tons per 12 consecutive month period

| Month | Gallons applied | % VOC | Tons VOC this month | Tons of VOC for the last 12 months |
|-------|-----------------|-------|---------------------|------------------------------------|
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |
|       |                 |       |                     |                                    |

| 9     | No deviation occurred in this month |  |  |  |  |
|-------|-------------------------------------|--|--|--|--|
| 9     | Deviation/s occurred in this month  |  |  |  |  |
| Dev   | ation has been reported on:         |  |  |  |  |
| Sub   | mitted by:                          |  |  |  |  |
| Title | /Position                           |  |  |  |  |
| Sig   | ature                               |  |  |  |  |
| Dat   | :                                   |  |  |  |  |
| Pho   | ne :                                |  |  |  |  |

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**Guide Corporation** 

Permit Reviewer: Holly M. Stockrahm

Source Name:

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY, COMPLIANCE DATA SECTION

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P.O. Box 6015, 100 North Senate Avenue, Indianapolis, Indiana 46206-6015 Phone: 317-233-5674, Fax: 317-233-6865

and

#### ANDERSON OFFICE OF AIR MANAGEMENT P.O. Box 2100, 120 East 8th Street, Anderson, IN 46011 **PART 70 OPERATING PERMIT** QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

2915 Pendleton, Ave. Anderson, IN 46016 Source Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016 Mailing Address: T 095-6894-00005 Part 70 Permit No.: Months: to Year: Page 1 of 2 This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". 9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. 9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD Permit Requirement (specify permit condition #) Date of Deviation: **Duration of Deviation: Number of Deviations: Probable Cause of Deviation:** Response Steps Taken: **Permit Requirement** (specify permit condition #) **Duration of Deviation:** Date of Deviation: Number of Deviations: **Probable Cause of Deviation:** 

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| Response Steps Taken:                        |                        |             |
|--|------------------------|-------------|
|  |                        | Page 2 of 2 |
| Permit Requirement (specify permit condition | n #)                   |             |
| Date of Deviation:                           | Duration of Deviation: |             |
| Number of Deviations:                        |                        |             |
| Probable Cause of Deviation:                 |                        |             |
| Response Steps Taken:                        |                        |             |
| Permit Requirement (specify permit condition | n #)                   |             |
| Date of Deviation:                           | Duration of Deviation: |             |
| Number of Deviations:                        |                        |             |
| Probable Cause of Deviation:                 |                        |             |
| Response Steps Taken:                        |                        |             |
| Permit Requirement (specify permit condition | n #)                   |             |
| Date of Deviation:                           | Duration of Deviation: |             |
| Number of Deviations:                        |                        |             |
| Probable Cause of Deviation:                 |                        |             |
| Response Steps Taken:                        |                        |             |
| Form Completed By:                           |                        |             |
| Title/Position:                              |                        |             |
|  |                        |             |
| Date:  |                        |             |
| Phone:                                       |                        |             |

Attach a signed certification to complete this report.

Guide Corporation First Minor Permit Modification No.: 095-17226-00005 Anderson, Indiana Modified by: ERG/YC OP No. T095-6894-00005

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Permit Reviewer: Holly M. Stockrahm

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY**

#### AND ANDERSON OFFICE OF AIR MANAGEMENT

#### **PART 70 OPERATING PERMIT CERTIFICATION**

**Guide Corporation** Source Name:

2915 Pendleton, Ave. Anderson, IN 46016 Source Address:

Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016 Mailing Address:

Part 70 Permit No.: T 095-6894-00005

| This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.                                 | i      |
|---|--------|
| Please check what document is being certified:  |        |
| 9 Annual Compliance Certification Letter  |        |
| 9 Test Result (specify)   |        |
| 9 Report (specify)  |        |
| 9 Notification (specify)  | _      |
| 9 Affidavit (specify)   | _      |
| 9 Other (specify)   |        |
|   |        |
| I certify that, based on information and belief formed after reasonable inquiry, the statements and infor in the document are true, accurate, and complete.  Signature: | mation |
| Printed Name:   |        |
| Title/Position:   |        |
| Phone:  |        |
| Date:   |        |

Guide Corporation First Minor Permit Modification No.: 095-17226-00005 Page 51 of 53
Anderson, Indiana Modified by: ERG/YC OP No. T095-6894-00005

Permit Reviewer: Holly M. Stockrahm

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION PART 70 OPERATING PERMIT

## CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

Source Name: Guide Corporation

Source Address: 2915 Pendleton, Ave. Anderson, IN 46016

Mailing Address: Anderson Operations, 2915 Pendleton Ave, Anderson, IN 46016

Part 70 Permit No.: T 095-6894-00005

Tank ID #: Electroforming/Tank #35A

Type of process: Decorative

Monitoring Parameter: Surface tension of the electroplating bath]

Parameter Value: 45 dynes per centimeter

Limits: Total chromium concentration may not exceed 0.015 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating and

Anodizing NESHAP only.

The frequency for completing this report may be altered by IDEM, OAQ,

Compliance Branch.

Companies classified

as a major source: Submit this report no later than 30 days after the end of the reporting period.

#### This form consists of 3 pages

Page 1 of 3

#### BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:

TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

#### MAJOR AND AREA SOURCES: CHECK ONE

- 9 NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
- 9 THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

#### AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:

IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

| JAN | APR | JUL | ост |
|-----|-----|-----|-----|
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

Guide Corporation First Minor Permit Modification No.: 095-17226-00005
Anderson, Indiana Modified by: ERG/YC

Permit Reviewer: Holly M. Stockrahm

ATTACH A SEPARATE PAGE IF NEEDED

Page 52 of 53 OP No. T095-6894-00005

Page 2 of 3

### CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

| HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.             |            |     |     |  |  |
|--|------------|-----|-----|--|--|
| JAN  | APR        | JUL | ост |  |  |
| FEB  | MAY        | AUG | NOV |  |  |
| MAR  | JUN        | SEP | DEC |  |  |
| IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT: |            |     |     |  |  |
| DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:   |            |     |     |  |  |
| ADDITIONAL COMMENTS  | <b>3</b> : |     |     |  |  |

Guide Corporation First Minor Permit Modification No.: 095-17226-00005 Page 53 of 53 Anderson, Indiana Modified by: ERG/YC OP No. T095-6894-00005

Permit Reviewer: Holly M. Stockrahm

Title/Position:

Signature:

Date:

Phone:

## CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

| ATTACH | A SEPARATE PAGE IF NEEDED   | Page 3 of 3 |
|--------|---|-------------|
| ALL SC | DURCES: CHECK ONE   |             |
| 9      | I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE. | IN          |
| 9      | THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORD WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ATTACHED.  |             |
|        | Submitted by:   |             |

Attach a signed certification to complete this report.

#### August 15, 2003

# Indiana Department of Environmental Management Office of Air Quality and Anderson Office of Air Management

## Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

#### **Source Background and Description**

Source Name: Guide Corporation

Source Location: 2915 Pendleton Avenue, Anderson, Indiana 46016

County: Madison SIC Code: 3714, 3647

Operation Permit No.: T095-6894-00005
Operation Permit Issuance Date: July 12, 2002
Minor Permit Modification No.: 095-17226-00005

Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Guide Corporation relating to the operation of the following new emission unit:

One (1) natural gas-fired fluidized bed furnace, identified as S-117-FB, used to burn off build-up materials on nozzles, racks, and manifolds, with a maximum heat input rate of 0.36 MMBtu/hr and a maximum throughput rate of 315 pounds per hour, using a cyclone and a 0.40 MMBtu/hr natural gas-fired afterburner (identified as S-117-AB) as control, and exhausting through stack S-117-1B. This furnace is also equipped with a 0.45 MMBtu/hr natural gas-fired preheater. (326 IAC 6-3-2 and 326 IAC 4-2).

Note: This unit is classified as an insignificant activity based on the definition in 326 IAC 2-7-1(21).

#### History

Guide Corporation is an existing plastic auto parts molding and assembly facility. Their Part 70 permit (#095-6894-00005) was issued on July 12, 2002. On May 7, 2003, Guide Corporation submitted an application to the OAQ requesting to install and operate a new fluidized bed furnace (S-117-FB), which will be controlled by a cyclone and an afterburner. This furnace is used for maintenance and cleaning purposes, including burning off the adhesives, clear coats, and paints on the nozzles, racks, and manifolds. Guide Corporation is an existing PSD major source. The installation of this furnace will not increase utilization of the existing units or cause debottlenecking of the existing processes.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit (T095-6894-00005) on July 12, 2002. The source has since received the following:

(a) First Reopening No. 095-16251-00005, issued on November 21, 2002.

Guide Corporation Anderson, Indiana Permit Reviewer: ERG/YC

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Stack Summary**

| Stack ID | Operation | Height<br>(feet) | Diameter<br>(feet) | Flow Rate (acfm) | Temperature<br>(°F) |
|----------|-----------|------------------|--------------------|------------------|---------------------|
| S-117-1B | Furnace   | 58               | 1.5                | 2,330            | 250                 |

#### Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 7, 2003.

#### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (page 1).

#### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant       | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | 3.01                          |
| PM-10           | 3.01                          |
| SO <sub>2</sub> | Negligible                    |
| VOC             | 0.17                          |
| CO              | 0.45                          |
| NO <sub>x</sub> | 0.53                          |

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

| HAPs   | Potential To Emit (tons/year) |
|--------|-------------------------------|
| *Total | 0.17                          |

Note: Assuming the worst-case scenario that all the VOC emissions are HAP emissions.

#### **Justification for Modification**

The construction of the proposed fluidized bed furnace is exempt from construction permitting requirements because the potential to emit from this unit is less than the exemption thresholds in 326 IAC 2-1.1-3(e)(1), and less than the Part 70 Source Modification requirements in 326 IAC 2-7-10.5. The operation of this furnace is being permitted through a Part 70 Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because this is a modification which meets all the criteria in 326 IAC 2-7-12(b)(1). This modification does not qualify for an administrative amendment because this modification triggers new applicable requirements, pursuant to 326 IAC 2-7-11(a)(7).

#### **County Attainment Status**

The source is located in Madison County.

| Pollutant       | Status     |
|-----------------|------------|
| PM-10           | Attainment |
| SO <sub>2</sub> | Attainment |
| NO <sub>2</sub> | Attainment |
| Ozone           | Attainment |
| CO              | Attainment |
| Lead            | Attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Madison County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
  Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2
  and since there are no applicable New Source Performance Standards that were in effect
  on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD
  and Emission Offset applicability.

#### **Source Status**

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant       | Emissions (tons/year) |
|-----------------|-----------------------|
| PM              | Greater than 250      |
| PM-10           | Greater than 250      |
| SO <sub>2</sub> | Greater than 250      |
| VOC             | Greater than 250      |
| со              | Greater than 250      |
| NOx             | Greater than 250      |

- (a) This existing source is a major stationary source because at least one of the attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document (TSD) for the Guide Corporation's Title V permit #095-6894-00005, issued on July 12, 2002.

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification.

|                            | Potential to Emit<br>(tons/year) |       |                 |      |      |                 |      |
|----------------------------|----------------------------------|-------|-----------------|------|------|-----------------|------|
| Process/facility           | PM                               | PM-10 | SO <sub>2</sub> | VOC  | СО   | NO <sub>X</sub> | HAPs |
| Fluidized Bed Furnace      | 3.01                             | 3.01  | Negligible      | 0.17 | 0.45 | 0.53            | 0.17 |
| PSD Significant Thresholds | 25                               | 15    | 40              | 40   | 100  | 40              | NA   |

This modification to an existing major stationary source is not major because the potential to emit from this unit is less than PSD significant thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The afterburner (S-117-AB) installed with the proposed furnace (S-117-FB) does not have a charging rate greater than 50 tons/day and is not used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter. Therefore, this afterburner does not meet the "incinerator" definition in 40 CFR 60.51. Therefore, the requirements of the New Source Performance Standard for Incinerators (40 CFR 60.50 -060.54, Subpart E) are not applicable to this unit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.
- (d) This modification does not involve a pollutant-specific emissions unit:
  - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
  - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the proposed fluidized bed furnace is not subject to 40 CFR Part 64 - Compliance Assurance Monitoring (CAM).

Guide Corporation Anderson, Indiana Permit Reviewer: ERG/YC

#### State Rule Applicability - Fluidized Bed Furnace (S-117-FB)

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The proposed fluid bed furnace will be constructed after July 27, 1997 and the potential to emit HAPs from this unit is less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this unit.

#### 326 IAC 4-2 (Incinerators)

The proposed furnace is subject to 326 IAC 4-2 (Incinerators) because it meets the definition of an incinerator, "an engineered apparatus that burns waste substances with controls on combustion factors..." contained in 326 IAC 1-2-34. Pursuant to 326 IAC 4-2-2, afterburner S-117-AB shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

#### 326 IAC 6-3-2 (Process Operations)

The propose furnace meets the incinerator definition contained in 326 IAC 1-2-34. Pursuant to 326 IAC 6-3-1(a)(2), an incinerator is exempt from the requirements of 326 IAC 6-3 (Process Operations).

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance

Guide Corporation Anderson, Indiana Permit Reviewer: ERG/YC

requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The proposed furnace is an insignificant unit. Therefore, there are no compliance monitoring requirements applicable to this furnace.

#### **Proposed Changes**

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a plastic molding and assembly operation, surface coating, which produce automotive lighting and trim parts and electronic components used in the automotive industry.

Responsible Official: Keith Updike Plant Manager

Source Address: 2915 Pendleton Ave., Anderson, IN 46016 with Chrome

Operations at 1316 Alexandria Pike, Anderson, IN 46012

Mailing Address: 2915 Pendleton Ave., Anderson, IN 46016

General Source Phone Number: (765) 221-6977 SIC Code: 3714, 3647 County Location: Madison

County Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source under PSD

Major Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
  - (e) Other emission units, not regulated by a NESHAP, with PM10 and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) natural gas-fired fluidized bed furnace, identified as S-117-FB, used to burn off build-up materials on nozzles, racks, and manifolds, with a maximum heat input rate of 0.36 MMBtu/hr and a maximum throughput rate of 315 pounds per hour, using a cyclone and a 0.40 MMBtu/hr natural gas-fired afterburner (identified as S-117-AB) as control, and exhausting through stack S-117-1B. This furnace is also equipped with a 0.45 MMBtu/hr natural gas-fired preheater. (326 IAC 4-2)

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Guide Corporation Anderson, Indiana Permit Reviewer: ERG/YC

#### **SECTION D.5**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(e) Other emission units, not regulated by a NESHAP, with PM10 and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

One (1) natural gas-fired fluidized bed furnace, identified as S-117-FB, used to burn off build-up materials on nozzles, racks, and manifolds, with a maximum heat input rate of 0.36 MMBtu/hr and a maximum throughput rate of 315 pounds per hour, using a cyclone and a 0.40 MMBtu/hr natural gas-fired afterburner (identified as S-117-AB) as control, and exhausting through stack S-117-1B. This furnace is also equipped with a 0.45 MMBtu/hr natural gas-fired preheater. (326 IAC 4-2)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the fluidized bed furnace shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

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Guide Corporation Anderson, Indiana Permit Reviewer: ERG/YC

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

In addition, the Part 70 Permit number in all the attached reporting forms have been corrected to "T095-6894-00005".

#### Conclusion

This permit modification shall be subject to the conditions of the attached Part 70 Minor Permit Modification No. T095-17226-00005.

### Appendix A: Emission Calculations Emissions from the Fluidized Bed Furnace (S-117-FB)

**Company Name: Guide Corporation** 

Address: 2915 Pendleton Ave., Anderson, IN 46016

MPM: 095-17226-00005 Reviewer: ERG/YC Date: May 16, 2003

#### 1. From the Furnaces:

Max. Input lbs/hr

315

|                            |      | Pollutant |                 |        |      |    |
|----------------------------|------|-----------|-----------------|--------|------|----|
|                            | PM   | **PM10    | SO <sub>2</sub> | $NO_x$ | VOC  | CO |
| *Emission Factor (lbs/ton) | 4.30 | 4.30      | NA              | NA     | 0.20 | NA |
|                            |      |           |                 |        |      |    |
|                            |      |           |                 |        |      |    |
| Potential to Emit (lbs/hr) | 0.68 | 0.68      | -               | -      | 0.03 | -  |
|                            |      |           |                 |        |      |    |
| Potential to Emit (ton/yr) | 2.97 | 2.97      | -               | -      | 0.14 | -  |
|                            |      |           |                 |        |      |    |

#### Methodology

Potential to Emit (lbs/hr) = Max. Input (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

Potential to Emit (tons/yr) = Max. Input (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

#### 2. From Natural Gas Combustion (Preheater, Furnace, and Afterburner):

Heat Input Capacity MMBtu/hr Potential Throughput MMCF/yr

1.21 (3 units total)

10.6

| Emission Factor in lb/MMCF    | PM*  | PM10* | SO <sub>2</sub> | **NO <sub>x</sub> | VOC  | CO   |
|-------------------------------|------|-------|-----------------|-------------------|------|------|
|                               | 7.6  | 7.6   | 0.6             | 100               | 5.5  | 84.0 |
| Potential Emission in tons/yr | 0.04 | 0.04  | 3.18E-03        | 0.53              | 0.03 | 0.45 |

Pollutant

#### Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### 3. Total emissions from this Furnace:

| Pol | lutant |
|-----|--------|

|                              |      | 1 Ollatailt |                 |                 |      |      |
|------------------------------|------|-------------|-----------------|-----------------|------|------|
|                              | PM   | PM10        | SO <sub>2</sub> | NO <sub>x</sub> | VOC  | CO   |
| *Potential to Emit (tons/yr) | 3.01 | 3.01        | 3.18E-03        | 0.53            | 0.17 | 0.45 |

<sup>\*</sup> Total PTE (tons/yr) = PTE from the furnace (tons/yr) + PTE from NG combustion (tons/yr)

<sup>\*</sup> There are no emission factors available for this fluidized bed furnace. The emission factors used here are from FIRE, Version 6.23, SCC 3-04-001-03 for Aluminum Smelting/Reverberatory Furnaces, which are the most similar processes.

<sup>\*\*</sup> Assume all the PM emissions equal PM10 emissions.

<sup>\*</sup>PM and PM10 emissions are included in the emission calculations for the smelting process because the emission factors for the smelting process are based on the stack test results.

<sup>\*\*</sup>Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32